



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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SEP 19 1985

SEP 18 1985

MEMORANDUM

SUBJECT: Collis Corporation; Clinton, Iowa

FROM: Dave Crawford, Site Project Officer, SCOM SPFD

TO: Dennis Degner, Project Engineer, RCRA PERM

THRU: Craig W. Smith P.E., Chief SCOM
Bob Morby, Chief SPFD
Mike Sanderson, Chief RCRA
Lynn Harrington, Chief PERM RCRA

PRMT SECTION
[Signature]

Some time ago an Administrative Order was issued to this company under this program, under Section 3013 of the Resource Conservation and Recovery Act (RCRA). The Order required environmental monitoring of the facility be conducted by the company, including but not limited to ground water.

We have completed our review of the Phase I monitoring and of the hydrogeologic assessment required by the Order. We understand that the facility's surface impoundments, which were being monitored under the 3013 Order, will be closed under the authority of RCRA as regulated units. Given the hydrogeologic setting of the site and the fate and uses (actual, as well as potential) of ground water, we believe that the RCRA closure of the impoundments will be sufficient to abate any further contamination of ground water.

The monitoring conducted under the 3013 Order also indicated that the facility had contributed metal contamination to the sediments of the adjacent Manufacturer's Ditch, which is a tributary of Mill Creek. We have previously provided this information to the Water Management Division (memorandum of August 15, 1984, to Mike Turvey).

Evaluation of the available ground and surface water monitoring data indicates that the site has caused some contamination to the shallow alluvial ground water and of the sediments of the Manufacturer's Ditch. We believe that closure of the surface impoundments is therefore warranted to prevent continued releases of contamination. You might also want to discuss with RECM the possibility of issuing a 3008h Order to require a corrective action on the sediments in adjacent Manufacturer's Ditch, if WATR reports the need for any assistance on this. We also recommend that the company be required to continue to monitor ground water, as some Total Organic Halides (TOX) contamination has been noted.

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USEPA, RCRA Branch



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RCRA RECORDS CENTER

We will be advising the company that we plan no further action under this program, but that we are recommending to the RCRA program that the inactive surface impoundments be properly closed. At this time we do not believe that any additional remedial actions are warranted and are planning no further action on this site under the Superfund program.

Please contact me if you have any questions or if we can be of further assistance.

cc: Ellen Goldman, CNSL
Don Sandifer, RCRA RECM
Pete Culver, TECH
Mike Turvey, WATR/WACM